

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Leon D. Black,

Plaintiff,

- against -

Guzel Ganieva, Wigdor LLP, Joshua Harris,  
and Steven Rubenstein

Defendants.

No. 1:21-cv-08824-PAE

Hon. Paul A. Engelmayer

**DECLARATION OF SUSAN ESTRICH**

Pursuant to 28 U.S.C. § 1746, I, Susan Estrich, declare as follows:

1. My name is Susan Estrich. I am over 21 years of age and am competent to give testimony. I am a partner with the law firm of Estrich Goldin LLP and am one of the attorneys representing Plaintiff in the above-captioned cases. By virtue of my role as counsel for Plaintiff, the statements contained in this declaration are based on my personal knowledge.

2. I respectfully make this declaration in support of Plaintiff's Motion for Leave to File a Second Amended Complaint.

3. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's Proposed Second Amended Complaint.

4. Attached hereto as Exhibit 1 to Plaintiff's Proposed Second Amended Complaint is a true and correct copy of Guzel Ganieva's Original Complaint in *Ganieva v. Black*, No. 155262/2021 (N.Y. Sup. Ct. June 1, 2021).

5. Attached hereto as Exhibit 2 to Plaintiff's Proposed Second Amended Complaint is a true and correct copy of Plaintiff's initial Answer, Affirmative Defenses, and Counterclaims in *Ganieva v. Black*, No. 155262/2021 (N.Y. Sup. Ct. July 19, 2021).

6. Attached hereto as Exhibit 3 to Plaintiff's Proposed Second Amended Complaint is a true and correct copy of Guzel Ganieva's Amended Complaint in *Ganieva v. Black*, No. 155262/2021 (N.Y. Sup. Ct. Aug. 9, 2021).

7. Attached hereto as Exhibit 4 to Plaintiff's Proposed Second Amended Complaint is a true and correct copy of Plaintiff's Answer to the Amended Complaint in *Ganieva v. Black*, No. 155262/2021 (N.Y. Sup. Ct. Sept. 8, 2021).

8. Attached hereto as Exhibit 5 to Plaintiff's Proposed Second Amended Complaint is a true and correct copy of Guzel Ganieva's Proposed Second Amended Complaint in *Ganieva v. Black*, No. 155262/2021 (N.Y. Sup. Ct. Sept. 20, 2021).

9. Attached hereto as Exhibit B is a redline showing the changes made to Plaintiff's Amended Complaint, Dkt. 46.

I declare under penalties of perjury that the foregoing is true and correct.

Executed on the 18th day of April, 2022.



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Susan R. Estrich